

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

TATIANA WESTBROOK, an individual;  
JAMES WESTBROOK, an individual;  
HALO BEAUTY PARTNERS, LLC, a  
Nevada Limited Liability Company,

Plaintiffs,

v.

KATIE JOY PAULSON, an individual;  
WITHOUT A CRYSTAL BALL, LLC, a  
Minnesota Limited Liability Company; and  
DOES 1 through 100, inclusive,

Defendants.

NO. 2:20-cv-01606 BJR

SUPPLEMENTAL DECLARATION OF  
KATHERINE PAULSON IN SUPPORT  
OF DEFENDANTS' MOTION FOR  
STATUS CONFERENCE

Katherine Paulson declares as follows:

1. I am over the age of 18 and am named as a defendant in this action. I make this declaration based on personal knowledge.

2. I make this declaration in support of Defendants' motion for a status conference regarding Plaintiffs' counsel's use of social media and threats of criminal prosecution.

1           3.       I have reviewed the Declaration of Natalie Kennett filed by Plaintiffs (Dkt. 46-3).  
 2  
 3       That declaration falsely accuses me of attempting to hack into Ms. Kennett's accounts and  
 4  
 5       otherwise harassing her, and alleges that I was somehow involved in what appear to have been  
 6  
 7       vicious and cruel online attacks on her in my name. I have never attempted to hack into her  
 8  
 9       accounts and I have done nothing to harass her. I have never asked or coordinated with anyone to  
 10  
 11       hack into her accounts or to harass her. The messages Ms. Kennett claims she received are vile  
 12  
 13       and cruel. I did not and would not send these or ask anyone to send them on my behalf. I myself  
 14  
 15       have received numerous personal attacks since this lawsuit began. I address specific paragraphs  
 16  
 17       and images below.

18           4.       Paragraph 6: I did not say I had to delete videos because of the lawsuit or for my  
 19  
 20       safety.

21           5.       Paragraph 7: The entire image is fabricated. I never wrote the words attributed to  
 22  
 23       me in this image, nor did I ever fear "facing charges" because of anything I wrote about Tati  
 24  
 25       Westbrook.

26           6.       Paragraphs 14 & 18: I have never asked anyone to "go after," harass, intimidate,  
 27  
 28       or punish Ms. Kennett nor have I "worked with" anyone, "closely" or otherwise, to harass, hack,  
 29  
 30       threaten, punish, or intimidate her.

31           7.       Paragraph 23: I have never attempted to gain access to Ms. Kennett's email  
 32  
 33       account. Recently, on a number of occasions, I have received notifications that my publicly-  
 34  
 35       available email address has been used in an apparent attempt to gain unauthorized access to  
 36  
 37       email and social media accounts. I have not done this. I believe others are doing this to  
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 39       manufacture "evidence" that I have made these improper attempts. Anyone with my email  
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 41       address—which is on my website—can do this. I addressed this in my first declaration, Dkt. 40.

42           8.       Ex. 3 at p. 43: I did *not* write "Don't tell anyone I deleted anything or il [sic] sue  
 43  
 44       you." Nor would I. This is a fabricated screenshot. Attached as Exhibit A is a true and correct  
 45  
 46       screenshot of the actual conversation between Ms. Kennett and myself. Exhibit A shows a

1 comparison of the genuine screenshot (left side) and the doctored one (right side). Ms. Kennett  
 2 deleted my actual comment—“Half these people have me blocked”—and replaced it with a  
 3 different text bubble saying “Don’t tell anyone I deleted anything or il [sic] sue you.” The Court  
 4 will note that the misspelling of “I’ll” is consistent with Ms. Kennett’s numerous misspellings in  
 5 her messages and, more importantly, that exact misspelling is repeated twice in the fake email  
 6 discussed next.  
 7

8  
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 10  
 11 9. Ex. 4 at 49. Ms. Kennett does *not* accuse me of sending this faked email, and in  
 12 fact I did not. However, the Court will note that the exact same misspelling of “I’ll” from the  
 13 Instagram message in paragraph 8 above—“il”—is repeated *twice* in this fake email. Further, I  
 14 never sent Ms. Kennett any emails at all. The Court should note that Ms. Kennett has now  
 15 forwarded to Plaintiffs’ counsel fake emails from my attorney, Michael Brown, containing  
 16 similar threats. Plaintiffs’ counsel apparently concedes Mr. Brown did not write these either.  
 17 Further still, the phrase “it don’t wash with me” is something I had never heard or seen or used  
 18 before reading this. Also, I would *never* refer to my son as “severely impaired” (he has Level  
 19 One autism and is medically fragile, *not* “severely impaired”). Finally, while this email has me  
 20 saying I have 4 million views and 120,000 subscribers, in fact I have **50** million views and  
 21 135,000 subscribers. These are not facts I would have misstated if I had written the email.  
 22

23  
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 29 10. I had nothing to do with the other messages reflected in Exhibits 1, 2, and 5 – 9.  
 30 The Facebook screenshots in Exhibit 5 are fakes. Nothing like this was ever posted to my  
 31 Facebook account.  
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1 I declare pursuant to the laws of perjury of the United States of America that the  
2  
3 foregoing is true and correct.  
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6 DATED this 29th day of January, 2021 at Hanover, Minnesota.  
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8 *Katherine Paulson*  
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11 Katherine Paulson  
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**Ex. A**

